

Congress of the United States
Washington, DC 20515

January 31, 2002

The Honorable Ann Veneman
Secretary of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Dear Secretary Veneman:

In November of 2002, the United States Department of Agriculture (USDA) filed a Federal Register notice that estimated costs for full implementation of the country-of-origin labeling (COOL) provision of fresh fruits, vegetables, meat and fish to be \$1.97 billion per year. We believe this figure is grossly over-inflated and neglects several mitigating factors.

Not only does USDA fail to account for origin labeling already required in several states, but it factors in costs for regulations currently mandated by USDA itself. For instance, USDA includes in this cost estimate mandatory record keeping when it already requires industry participants to keep sales records for two years. These same regulations would satisfy the COOL guidelines or could be easily altered to do so.

We believe a more thorough examination of actual COOL implementation in states like Florida provide a more valid cost-estimate model. In the state of Florida, implementation costs range from only one to two man-hours of work per store per week. As this program has been in effect for over twenty years, we believe this to be a very reliable model. In addition, the USDA's very own Food Safety and Inspection Service (FSIS) suggested that additional costs for country of origin labeling "may not exceed what is now being spent on federal inspection."

Furthermore, we are also concerned about the direction USDA is moving with regard to blended and mixed products. The suggested guidelines do not require the label to list the actual percentage of weight for each constituent ingredient. We believe that unless the package contains an actual percentage of weight or the label directly states that countries appear in the order of having the most ingredients in the package, consumers will still not be aware of what they are purchasing.

Madam Secretary, during consideration of the Bono-Hooley amendment to include COOL within the Farm Bill, Members of Congress overwhelmingly approved of this provision by a tally of 296-121 (Roll Call 370, October 4, 2001). Although there was and continues to be disagreement over COOL, we urge you to follow the spirit and letter of the law as agreed to by so many Members.

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Thank you for your consideration. Should you have additional questions or concerns, please do not hesitate to contact us directly or instruct your staff to contact Linda Valter (Rep. Bono's office) at 202-225-5330.

Sincerely,

Mary Bono

Pauline Horley

Earl Perry

Bob Filner

Charlie Norwood

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Earl Blumenauer

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J. L. Mottly

Shirley Breen

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